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IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA  
 NORTHERN DIVISION

DANIEL E. NAHOURAIL,

Plaintiff,

v.

KILOLO KIJAKAZI,  
 Acting Commissioner of  
 Social Security,

Defendant.

CIVIL ACTION NO.  
 3:21-cv-00456-CLB

MOTION FOR EXTENSION OF  
 TIME TO FILE PLAINTIFF'S  
 MOTION FOR REVERSAL  
 AND/OR REMAND AND  
 SUPPORTING BRIEF

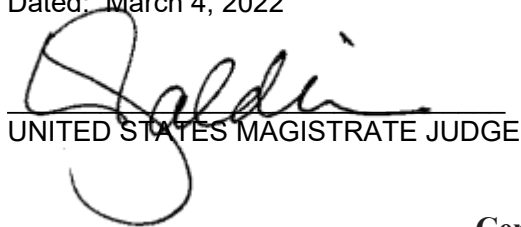
AND NOW comes plaintiff, by and through counsel, Mark D. Barrett, Esq. and Hal Taylor, Esq., and respectfully requests an extension of time of Thirty (30) DAYS to file his Motion for Reversal and/or Remand and Supporting Brief. This is Plaintiff's first request for an extension of time.

There is good cause for this request. The certified administrative record in the case is 1,170 pages and plaintiff intends on raising multiple fact-intensive issues, which combined with an unusually busy briefing schedule has resulted in the need for this request. As the Court is undoubtedly aware, defendant has been diligently working to “catch-up” the backlog of certified transcripts due in federal court Social Security disability appeals nationwide, which has had the effect of significantly increasing the number of cases calendared for briefing.<sup>1</sup> As a result, plaintiff respectfully requests a 30-day extension of time to file his opening brief; plaintiff will endeavor to submit his brief in advance of the extended deadline, but based on the foregoing respectfully requests an extension in order to ensure that the issues are fully and concisely presented to the Court.

Counsel for the defendant has been contacted and has no objection to this motion being granted, provided that SSA is allowed a concomitant extension of time to file its response.

Plaintiff's opening brief is due on or before April 11, 2022.

IT IS SO ORDERED.  
Dated: March 4, 2022



UNITED STATES MAGISTRATE JUDGE

BY: /s/ Hal Taylor  
Hal Taylor, Esq.  
Local Counsel  
March 4, 2022

BY: /s/ Mark D. Barrett  
Mark D. Barrett, Esq.  
Pro Hac Vice Attorney for Plaintiff  
March 4, 2022

### Certificate of Service

I hereby certify that on the 4th day of March, 2022, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which would then electronically

<sup>1</sup> In affidavits filed in many Social Security disability appeals from Jebby Rasputnis, SSA's Executive Director of the Office of Appellate Operations, Defendant reports that the Agency has essentially doubled the rate of production that existed pre-COVID-19 pandemic (from an average of 300-400 hearing transcriptions per week prior to the pandemic and to its current capacity to produce more than 700 per week).

1 notify the following CM/ECF participants on this case:

2  
3 Allison Cheung, Esq.  
4 Social Security Administration  
5 Office of the General Counsel  
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7 San Francisco, CA 94105  
8 allison.cheung@ssa.gov

9 /s/ Hal Taylor  
10 Hal Taylor, Esq.

11 /s/ Mark D. Barrett  
12 Mark D. Barrett, Esq.